

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT TACOMA

NANCY JOHNSON,

Plaintiff,

vs.

TARGET CORPORATION, a Minnesota Corporation; and TARGET STORES, INC., a Minnesota Corporation,

Defendants.

No. C06-5094RJB

STIPULATION RE: WAIVER OF DAMAGES AND REMAND TO STATE COURT

With regard to the claims for damages which are the subject of the Complaint herein, Plaintiff Nancy Johnson hereby agrees to release Target Corporation and improperly named Target Stores, Inc., from all such claims in excess of \$70,000 and to waive all claims for damages in excess of \$70,000. In exchange for this waiver/release, the parties hereby agree that the case may be remanded back to state court.

This agreement shall not release, waive or bar plaintiff's claims herein up to and including \$70,000.00.

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**FORSBERG & UMLAUF, P.S.**  
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(206) 689-8500 • (206) 689-8501 FAX

DATED this 3<sup>rd</sup> day of March, 2006.

FORSBERG & UMLAUF, P.S.

By: s/\_\_\_\_\_  
Roy A. Umlauf, WSBA #15437  
Attorneys for Defendant Target Corporation

DATED this 3<sup>rd</sup> day of March, 2006

SCHAUERMANN THAYER & JACOBS

By: s/\_\_\_\_\_  
Jeffrey P. Jacobs, WSBA #24987  
Attorneys for Plaintiff

ORDER

This matter having come before the court on this stipulation of the parties, the court  
hereby remands the case to Clark County Superior Court Cause No. 06-2-00092-1.

DATED this 13<sup>th</sup> day of March, 2006.

  
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ROBERT J. BRYAN  
United States District Judge

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